

UNITED STATES BANKRUPTCY COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:	)	
	)	Chapter 7
MICHAEL S. HELMSTETTER,	)	
	)	Bankruptcy No. 19-28687
DEBTOR	)	
	)	Honorable Jacqueline Cox

**AMENDED NOTICE OF FILING**

My office attempted to file the Notice of Filing and Notice of Objection via the Court's ECF system on September 24, 2021. We encountered technical difficulties which appear to be related to the recent upgrading of the ECF system. We also emailed copies to those on the service list per Rule of Bankruptcy Procedure 036.

Attorney Richard Hirsh served as the lead bankruptcy attorney for Debtor from May, 2020 until his recent retirement. A solo practitioner, Attorney Hirsh closed his office upon retirement.

We anticipate that Debtor will engage new bankruptcy counsel in the near future.

Respectfully submitted,

/s/ Nicola S. Tancredi

**LAW OFFICE OF NICOLA S. TANCREDI**

Law Office of Nicola Tancredi  
Two TransAm Plaza, Suite 250

Nicola S. Tancredi, Law Offices of Nicola S. Tancredi  
Attorney for Debtor Michael Helmstetter  
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**NOTICE OF FILING OF NOTICE OF OBJECTION**

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that DEBTOR MICHAEL HELMSTETTER has filed on September 24, 2021, a Notice of Objection to the Trustee's Motion for Approval (I) Bidding Procedures, (II) Sale of Causes of Action Free and Clear of Liens, Claims, and Other Interests, and (III) to Limit Notice (Dkt. No. 139); a copy of which is hereby provided to you.

Michael Helmstetter, Debtor by his attorney

/s/ Nicola S. Tancredi

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**CERTIFICATE OF SERVICE**

I, Nicola S. Tancredi, Debtor's attorney, hereby certifies that on September 24, 2021, I served the above and foregoing Notice of Filing of Notice of Objection to the Trustee's Motion for Approval to those listed on the Service List noted above via the ECF, electronic filing system of the US Bankruptcy Court or email as indicated below.

/s/ Nicola S. Tancredi

**LAW OFFICE OF NICOLA S. TANCREDI**

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SERVICE LIST

Via ECF

Patrick Layng, United States Trustee

David Herzog, Trustee

Gregory K. Stern, Attorney for Trustee David Herzog

Via Email

Harold Israel, Levenfeld Pearlstein, Attorney for Richard Ruscitti and Kingdom Chevrolet, Inc.

(email: [hisrael@lplegal.com](mailto:hisrael@lplegal.com))

Dennis Quaid (email: [dquaid3@gmail.com](mailto:dquaid3@gmail.com))

Jeffrey Paulsen

Email: [jpaulsen@wfactorlaw.com](mailto:jpaulsen@wfactorlaw.com)